

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

PHILIP FLOYD,
Plaintiff

vs.

ANDREA K. BOURESSA, et. al.
Defendants.

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§

CIVIL ACTION NO. 4:24-CV-00681

PLAINTIFF'S RESPONSE TO SHERIFF JIM SKINNER'S MOTION TO DISMISS

TO THE HONORABLE AILEEN GOLDMAN DURRETT:

COMES NOW, Philip Floyd and files this response to Sheriff Jim Skinner's Motion to Dismiss (Dkt. 44) and shows this Court as follows:

In Defendant Skinner's introduction and overview, he makes the same trite and false complaint that Plaintiff's he "... is disgruntled about the rulings in and results of the State court lawsuit in the 471st District Court of Collin County." Plaintiff is disappointed in the total failure of the judicial system to follow the law of the United States of America; specifically the 5th and 14th Amendments of the United States Constitution as well as the Texas Constitution and the evidentiary case laws of the State of Texas and the cavalier attitude of our elected officials towards those laws. Plaintiff suggests that Defendant Skinner read Plaintiff's responses to the motions to dismiss of the other defendants to get a better understanding of the abuse of process that Plaintiff has been subjected to regarding his case.

As concerns the Office of the Sheriff of Collin County, Texas, Plaintiff will show at trial the following:

2024.03.07	Counsel for Plaintiff called Collin County Sheriff's Office (CCSO) and scheduled appointment to meet with an investigator. Counsel met with Investigator Matther Polk in McKinney later that day. Matthew Polk, Investigator, Criminal Investigations Division, Collin County Sheriff's Office, 4300 Community Ave., McKinney, TX 75071 972.547.5100 Main; 972.547.5373 Direct; mapolk@co.collin.tx.us ; at the meeting Investigator Polk was given a complaint document. (See Exhibit 1)
2024.03.08	Counsel received call from Jay Reim who said he was the investigator on the complaint and that he would be out today for a funeral and next week but he would start working on report when he returned.
2024.03.11	When Sgt. Reim called, counsel misplaced his name and a few days later Counsel emailed Investigator Polk requesting the name of the investigator assigned to the complaint. (See Exhibit 2)
2024.03.15	Counsel received an email from Matthew Polk regarding the name of the person that called me last week saying that Sgt. Reim will not be back in the office until next week. jreim@co.collin.tx.us (See Exhibit 3)
2024.03.22	Counsel sent an email to Sgt. Reim requesting status of the complaint. (See Exhibit 4) Sgt. Reim responded that he would meet with the DA next week. (See Exhibit 5)
2024.03.26	Counsel received Email from Sgt. Reim that reads as follows: I met with the District Attorney's Office this morning and gave them the facts of the case. They declined to refer the case. (See Exhibit 6)
2024.05.16	Counsel made a Public Information Request to the Collin County DA.
2024.05.17	Counsel made a Public Information Request to the Collin County Sheriff P003111-051724
2024.05.29	Counsel received an email from Deborah F. Harrison, Assistant District Attorney stating; I have received your Public Information Act request. You have asked for a copy of the file including all communications between the Sheriff's Department and the Collin County District Attorney's regarding a criminal complaint that you filed with the Sheriff's Office. The attached criminal complaint is all that was provided to our office by the Sheriff's Office and there are no other records involving this complaint in the file or any records of correspondence. (See Exhibit 7)
2024.05.30	Counsel sent a follow up email to Ms. Harrison stating; I assume from your response that there is no record at the DA's office as to any review or report responding to the complaint? Is there anyway to tell if the complaint was even reviewed by a named individual in the DA's office? (See Exhibit 8)

2024.05.30	Ms. Harrison responded, “That is correct, the only record the DA’s office has related to this complaint is the complaint itself.” (See Exhibit 9)
2024.05.30	Counsel sent the following to Ms. Harrison; “Not to belabor the point, but the Sheriff’s office said they met with someone in the DA’s office about the complaint and that the DA declined to pursue the complaint. Are you saying there is no record of a meeting between anyone in the DA’s office and the Sheriff’s office about the complaint?” (See Exhibit 10)
2024.06.03	Ms. Harrison responded, “That is correct, the only record the DA’s office has related to this complaint is the complaint itself.” (See Exhibit 11)
2024.07.16	Counsel Received a response from the CCSO with a very confusing statement regarding Sheriffs Office MEDIA REPORT No. 24046809. (See Doc. 44-4)

What is interesting about Defendant Skinner’s Motion to Dismiss (Doc. 44) is contained on page 5, the first indented paragraph, where again he makes the same trite and false complaint: “More specifically, Requestor apparently did not agree with the Judge’s rulings and/or her “FINDINGS OF FACT AND CONCLUSIONS OF LAW” entered in the case.” This is all a parroting of an intentionally misleading defense that he knows is a false premise.

Defendant Skinner then states on page 5, the second indented paragraph, “The Sheriff’s Office’s law enforcement activities and results of their investigation are memorialized in the resulting Collin County Sheriff’s Office INCIDENT REPORT NO. 24046809.” There is nothing memorialized in INCIDENT REPORT NO. 24046809. (See Doc. 44-4)

There are two questions that all of the Defendants refuse to attempt to answer because it will show evidence of their involvement in the cover up and conspiracy;

1. What evidence is there in the Reporter’s Record for the August 1, 2022 hearing supports the Judgment; and

2. Where in the Reporter’s Record for the August 1, 2022 hearing are the “findings of fact” contained in Defendant Bouressa’s Findings of Fact and Conclusions of Law filed in the

State case on December 9, 2022?

A real investigator with law enforcement would have asked the above two questions. It would be malfeasance to not have answered those two questions in an investigation. Instead of doing a proper investigation, Defendant Skinner immediately requests a Texas Attorney Opinion to cover up the fact that the department had not done an investigation. (See Doc. 44-1)The Texas Attorney Opinion is as confusing as the reason Defendant Skinner had of requesting an opinion. (See Doc. 44-3) Notwithstanding the above, it is clear that the Collin County Sheriff's Office is attempting to cover up its willingness to deprive Plaintiff of his civil rights by the ridiculous document entitled Collin County Sheriff's Office INCIDENT REPORT NO. 24046809.

AS CONCERNS GROUNDS FOR RELIEF

Plaintiff believes that contained in Count 2 in the Amended Complaint is sufficient information to apprise Defendant Skinner of the cause of action. Additionally, the Exhibits attached hereto show a clear pattern of a cover up by the Sheriff's Office in this case. The policy of the Sheriff's Office is as stated by Sheriff Skinner when he stated in his Motion to Dismiss on page 5, the second indented paragraph, "The Sheriff's Office's law enforcement activities and results of their investigation are memorialized in the resulting Collin County Sheriff's Office INCIDENT REPORT NO. 24046809."

AS CONCERNS A CLAIM AGAINST SHERIFF SKINNER

Plaintiff believes that contained in Count 2 in the Amended Complaint is sufficient information to apprise Defendant Skinner of the cause of action. Additionally, the Exhibits attached hereto show a clear pattern of a cover up by the Sheriff's Office in this case.

The cause of action against Sheriff Skinner is for violations of 42 U.S.C. § 1985(2), Conspiracy to interfere with civil rights by fabrication of evidence. If Sheriff Skinner is saying

he was not personally involved in the decisions shown above, he know who was and should name them. Otherwise, Plaintiff is saying Sheriff Skinner personally made the decision to cover up the allegation that Judge Bouressa violated Texas Penal Code Sec. 37. 37.09. TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE, when she filed falsified and fabricated Findings of Fact and Conclusions of Law in a proceeding with the intent to the with intent to affect the course or outcome of the official court proceeding.

Sheriff Skinner needs to answer, “How does falsifying evidence in a FOFCOL meant for a higher court proceeding not rise to the level of a criminal offense?”

PRAYER

Plaintiff prays that the Motion to Dismiss filed by Sheriff Skinner Bouressa be denied and he be required to file an answer in this cause.

Respectfully submitted,

/s/ Douglas T. Floyd
DOUGLAS T. FLOYD
Attorney for Plaintiff
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
877-846-3149 Fax
SBN: 07181700
Lawyerfloyd@aol.com

CERTIFICATE OF SERVICE

I certify that a copy of the above Plaintiff’s Response to Judge Bouressa’s Motion to Dismiss was served on October 11, 2024, upon all parties who have entered an appearance, using the CM/ECF system.

/s/ Douglas T. Floyd
DOUGLAS T. FLOYD

EXHIBIT 1

Re: CRIMINAL COMPLAINT REGARDING CAUSE NO. 471-02423-2021; PHILIP FLOYD, Plaintiff v. MMWKM ADVISORS, LLC, Series ERD I and ELIAS DRAGON, Defendants

On December 9, 2022, in the above proceedings Judge Andrea Bouressa, judge for the 471st District Court, filed “Findings of Facts and Conclusions of Law.” See Attachment A. The Findings of Facts and Conclusions of Law is a total falsification of facts. Judge Bouressa knew at the time she filed the document in the proceeding that the contents were materially false. It is serious judicial misconduct for a judge to file a document in the records that contains falsified matters. Judge Bouressa knew when she filed the document in the above referenced proceedings, the document would subsequently be filed in the 5th Court of Appeals and that the Court of Appeals would materially rely on the contents of the document.

On December 12, 2023, the Court of Appeals specifically stated that they relied on the “Findings of Fact,” See Attachment B, pages 5 and 6. Judge Bouressa knew on December 12, 2023, that the Court of Appeals had in fact materially relied on the false facts she had filed and she has done nothing to correct the matter. For Judge Bouressa to continue with the cover up of the filing of false matters in a proceeding until the present date is an abuse of her judicial duty of candor and accountability and shows clear bias against Plaintiff and partiality toward Defendants.

I reasonably believe that counsel for Judgment Debtors as agents for and with the prior knowledge of the Judgment Debtors actually prepared the “Findings of Facts and Conclusions of Law” that Judge Bouressa filed. Judgment Creditors do not have clean hands in this matter and have participated in the cover up of the document filed by Judge Bouressa that continues to the present date. A lawyer has a duty of candor to a tribunal under Texas Disciplinary Rule 3.03. This duty requires counsel in a case to correct mistaken or inaccurate statements made in the Tribunal that was caused by the actions of the lawyer.

The facts related above are true and correct. In my opinion, Judge Bouressa has potentially committed a felony under the Texas Penal Code Sec. 36. Bribery and Corrupt Influence and Sec. 37. Perjury and Other Falsifications when she filed the “Findings of Facts and Conclusions of Law” in this cause. Sec. 37.09. TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE, states:

(a) **A person commits an offense if, knowing that an investigation or official proceeding is pending or in progress, he:**

(1) alters, destroys, or conceals any record, document, or thing with intent to impair its verity, legibility, or availability as evidence in the investigation or official proceeding; or

(2) **makes, presents, or uses any record, document, or thing with knowledge of its falsity and with intent to affect the course or outcome of the investigation or official proceeding.**

(b) This section shall not apply if the record, document, or thing concealed is privileged

or is the work product of the parties to the investigation or official proceeding.

(c) An offense under Subsection (a) or Subsection (d)(1) is a felony of the third degree, unless the thing altered, destroyed, or concealed is a human corpse, in which case the offense is a felony of the second degree. An offense under Subsection (d)(2) is a Class A misdemeanor.

This matter should be referred to the Criminal District Attorney of Collin County for further consideration.

Respectfully Submitted,

/S/ DOUGLAS T. FLOYD

DOUGLAS T. FLOYD

Attorney for Plaintiff

6521 Preston Rd., Suite 100

Plano, Texas 75024

214-704-7081

877-846-3149 Fax

SBN: 07181700

Lawyerfloyd@aol.com

EXHIBIT 2

Criminal Complaint - Judge Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: mapolk@collincountytx.gov

Bcc: [REDACTED]

Date: Monday, March 11, 2024 at 09:56 AM CDT

Dear Investigator Polk:

We met on March 7, 2024, when I submitted a criminal complaint against Judge Andrea Bouressa. Someone called me on March 8, 2024; I believe he said he was in charge of the investigation and that because he would be on vacation this week, the earliest it would be sent to the District Attorney was next week. I failed to write down his name. Do you know the name of the person that called me?

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com

EXHIBIT 3

RE: Criminal Complaint - Judge Andrea Bouressa

From: Matthew Polk (mapolk@co.collin.tx.us)

To: lawyerfloyd@aol.com

Cc: jreim@co.collin.tx.us

Date: Friday, March 15, 2024 at 04:58 PM CDT

Mr. Floyd,

Sgt. Reim is assigned this case. I have included him on the email. He will not be back in the office until next week.

Thank you,

**Matthew Polk, Investigator**

Criminal Investigations Division
Collin County Sheriff's Office
4300 Community Ave.
McKinney, TX 75071
972.547.5100 Main
972.547.5373 Direct
mapolk@co.collin.tx.us

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From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Monday, March 11, 2024 9:56 AM
To: Matthew Polk <mapolk@co.collin.tx.us>
Subject: Criminal Complaint - Judge Andrea Bouressa

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Dear Investigator Polk:

We met on March 7, 2024, when I submitted a criminal complaint against Judge Andrea Bouressa. Someone called me on March 8, 2024; I believe he said he was in charge of the investigation and that because he would be on vacation this week, the earliest it would be sent to the District Attorney was next week. I failed to write down his name. Do you know the name of the person that called me?

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com



image001.png
110.2kB

EXHIBIT 4

Complaint against Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: jreim@co.collin.tx.us

Date: Friday, March 22, 2024 at 02:10 PM CDT

Good afternoon;

Is there any update on the complaint I filed against Andrea Bouressa?

Sincerely,

Douglas T. Floyd
214-704-7081
lawyerfloyd@aol.com

EXHIBIT 5

RE: Complaint against Andrea Bouressa

From: Jay Reim (jreim@co.collin.tx.us)

To: lawyerfloyd@aol.com

Date: Friday, March 22, 2024 at 03:29 PM CDT

I am hoping to meet with the District Attorney's Office early next week.

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Friday, March 22, 2024 2:10 PM
To: Jay Reim <jreim@co.collin.tx.us>
Subject: Complaint against Andrea Bouressa

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Good afternoon;

Is there any update on the complaint I filed against Andrea Bouressa?

Sincerely,

Douglas T. Floyd

214-704-7081

lawyerfloyd@aol.com

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EXHIBIT 6

Re: Complaint against Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: jreim@co.collin.tx.us

Date: Friday, March 22, 2024 at 03:34 PM CDT

Thank you for the response.

Sincerely,

Douglas T. Floyd
214-704-7081
lawyerfloyd@aol.com

On Friday, March 22, 2024 at 03:29:11 PM CDT, Jay Reim <jreim@co.collin.tx.us> wrote:

I am hoping to meet with the District Attorney's Office early next week.

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Friday, March 22, 2024 2:10 PM
To: Jay Reim <jreim@co.collin.tx.us>
Subject: Complaint against Andrea Bouressa

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Good afternoon;

Is there any update on the complaint I filed against Andrea Bouressa?

Sincerely,

Douglas T. Floyd
214-704-7081
lawyerfloyd@aol.com

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EXHIBIT 7

Re: Complaint against Andrea Bouressa

From: Jay Reim (jreim@co.collin.tx.us)

To: lawyerfloyd@aol.com

Date: Friday, March 22, 2024 at 04:18 PM CDT

I have a meeting set up for Tuesday with the district attorneys office.

Sergeant Jay Reim

Criminal Investigation Division

Collin County Sheriff's Office

4300 Community Ave.<x-apple-data-detectors://2/0>

McKinney, TX 75071<x-apple-data-detectors://2/0>

972.547.5100<tel:972.547.5100> Main

972.547.5161<tel:972.547.5161> Direct

jreim@collincountytx.gov<mailto:jreim@collincountytx.gov>

On Mar 22, 2024, at 15:34, Douglas T. Floyd <lawyerfloyd@aol.com> wrote:

***** WARNING: External Email. Do not click links or open attachments that are unsafe. *****

Thank you for the response.

Sincerely,

Douglas T. Floyd

214-704-7081

lawyerfloyd@aol.com

On Friday, March 22, 2024 at 03:29:11 PM CDT, Jay Reim <jreim@co.collin.tx.us> wrote:

I am hoping to meet with the District Attorney's Office early next week.

From: Douglas T. Floyd <lawyerfloyd@aol.com>

Sent: Friday, March 22, 2024 2:10 PM

To: Jay Reim <jreim@co.collin.tx.us>

Subject: Complaint against Andrea Bouressa

***** WARNING: External Email. Do not click links or open attachments that are unsafe. *****

Good afternoon;

Is there any update on the complaint I filed against Andrea Bouressa?

Sincerely,

Douglas T. Floyd

214-704-7081

lawyerfloyd@aol.com<mailto:lawyerfloyd@aol.com>

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EXHIBIT 8

I just wanted to check and see if you had any further documentation to present during my meeting, besides the information you already provided to us.

Thank you



Jay Reim, Sergeant
Criminal Investigations Division
Collin County Sheriff's Office
4300 Community Ave.
McKinney, TX 75071
972.547.5100 Main
972.547.5161 Direct



EXHIBIT 10

RE: Complaint against Andrea Bouressa

From: Jay Reim (jreim@co.collin.tx.us)
To: lawyerfloyd@aol.com
Date: Monday, March 25, 2024 at 10:45 AM CDT

Thank you sir

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Monday, March 25, 2024 10:34 AM
To: Jay Reim <jreim@co.collin.tx.us>
Subject: Re: Complaint against Andrea Bouressa

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Please see the attached supplement to the complaint I previously filed.

Sincerely,

Douglas T. Floyd
Attorney at Law
6521Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

On Monday, March 25, 2024 at 09:02:31 AM CDT, Jay Reim <jreim@co.collin.tx.us> wrote:

I just wanted to check and see if you had any further documentation to present during my meeting Tuesday besides the information you already provided to us.

Thank you

about:blank

1/3



Criminal Investigations Division
Collin County Sheriff's Office
4300 Community Ave.
McKinney, TX 75071
972.547.5100 Main
972.547.5161 Direct

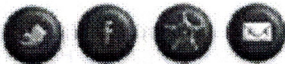


EXHIBIT 11

Re: Complaint against Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: jreim@co.collin.tx.us

Date: Monday, March 25, 2024 at 08:34 PM CDT

Investigator Reim,

You probably don't need the reporter's record of the August 1, 2022, hearing at this stage in the investigation, but I am sending it anyway. Any attorney looking at the reporter's record can immediately see that there was no evidence offered at the hearing, therefore there were no "facts" to be found. Not witnesses testified and no documents were admitted in the reporter's record. Because there were no "facts" in the record, Andrea Bouressa simply made them up, ie. falsified the facts.

The cover page of the reporter's record has the wrong date on it, but the inside page 3 shows that the hearing was on August 1, 2022.

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com



P-2 RR Vol. 4 of 5 Hearing.pdf
154.2kB

EXHIBIT 12

Re: Complaint against Andrea Bouressa

From: Jay Reim (jreim@co.collin.tx.us)

To: lawyerfloyd@aol.com

Date: Monday, March 25, 2024 at 08:49 PM CDT

Ok thank you I will add it to the packet

Sergeant Jay Reim
Criminal Investigation Division
Collin County Sheriff's Office
4300 Community Ave.<x-apple-data-detectors://2/0>
McKinney, TX 75071<x-apple-data-detectors://2/0>
972.547.5100<tel:972.547.5100> Main
972.547.5161<tel:972.547.5161> Direct
jreim@collincountytx.gov<mailto:jreim@collincountytx.gov>

On Mar 25, 2024, at 20:34, Douglas T. Floyd <lawyerfloyd@aol.com> wrote:

***** WARNING: External Email. Do not click links or open attachments that are unsafe. *****

Investigator Reim,

You probably don't need the reporter's record of the August 1, 2022, hearing at this stage in the investigation, but I am sending it anyway. Any attorney looking at the reporter's record can immediately see that there was no evidence offered at the hearing, therefore there were no "facts" to be found. Not witnesses testified and no documents were admitted in the reporter's record. Because there were no "facts" in the record, Andrea Bouressa simply made them up, ie. falsified the facts.

The cover page of the reporter's record has the wrong date on it, but the inside page 3 shows that the hearing was on August 1, 2022.

Douglas T. Floyd
Attorney at Law
6521Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com

<P-2 RR Vol. 4 of 5 Hearing.pdf>

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EXHIBIT 13

Re: Complaint against Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: jreim@co.collin.tx.us

Date: Tuesday, March 26, 2024 at 06:03 AM CDT

Good Morning. I should have sent you the Lavalley case which I have attached below as an example of a criminal case under Texas Penal Code Sec. 37.09. See page 6 of the case.

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com



CRIMINAL Lavalley v State 142000245CR Tex App Sep 02 2021.pdf
134kB

EXHIBIT 14

Re: Complaint against Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: jreim@co.collin.tx.us

Date: Tuesday, March 26, 2024 at 07:19 AM CDT

Attached is the Application to Confirm the Award. The "Award" attached to the Application must be included in the reporter's record for August 1, 2022. Failure to properly introduce the Award is fatal. The judge knows this and that is why she falsified the Findings of Fact to say that she hearing evidence to support the judgment. But the reporter's record is the official record and there was no evidence presented. Her cover up is worse than the crime. I asked her on September 1, 2022, by a filed a Motion for New Trial to give her an opportunity to correct the record. On October 31, 2022, there was a hearing on the Motion for New Trial and she denied a new trial where there was an opportunity to correct her past conduct. There is a reporter's record for the October 31, 2022 hearing.

The paper trail is the reporter's record of all hearings as well as the clerk's record of all documents filed in the case.

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com



16 Verified Application to Confirm Arbitration Award and Motion to Enter Final Judgment.pdf
985kB

EXHIBIT 15

RE: Complaint against Andrea Bouressa

From: Jay Reim (jreim@co.collin.tx.us)

To: lawyerfloyd@aol.com

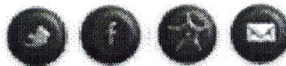
Date: Tuesday, March 26, 2024 at 02:05 PM CDT

Mr. Floyd,

I met with the District Attorney's Office this morning and gave them the facts of the case. They declined to refer the case.



Jay Reim, Sergeant
Criminal Investigations Division
Collin County Sheriff's Office
4300 Community Ave.
McKinney, TX 75071
972.547.5100 Main
972.547.5161 Direct



From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Tuesday, March 26, 2024 7:19 AM
To: Jay Reim <jreim@co.collin.tx.us>
Subject: Re: Complaint against Andrea Bouressa

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Attached is the Application to Confirm the Award. The "Award" attached to the Application must be included in the reporter's record for August 1, 2022. Failure to properly introduce the Award is fatal. The judge knows this and that is why she falsified the Findings of Fact to say that she hearing evidence to support the judgment. But the reporter's record is the official record and there was no evidence presented. Her cover up is worse than the crime. I asked her on September 1, 2022, by a filed a Motion for New Trial to give her an opportunity to correct the record. On October 31, 2022, there was a hearing on the Motion for New Trial and she denied a new trial where there was an opportunity to correct her past conduct. There is a reporter's record for the October 31, 2022 hearing.

The paper trail is the reporter's record of all hearings as well as the clerk's record of all documents filed in the case.

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

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EXHIBIT 16

Re: Complaint against Andrea Bouressa

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: jreim@co.collin.tx.us

Date: Tuesday, March 26, 2024 at 02:07 PM CDT

I am not happy with that and I intend to file it myself with the Texas Rangers. I strongly suggest that they reconsider the complaint.

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com

On Tuesday, March 26, 2024 at 02:05:01 PM CDT, Jay Reim <jreim@co.collin.tx.us> wrote:

Mr. Floyd,

I met with the District Attorney's Office this morning and gave them the facts of the case. They declined to refer the case.



Jay Reim, Sergeant

Criminal Investigations Division

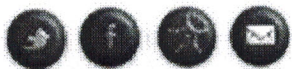
Collin County Sheriff's Office

4300 Community Ave.

McKinney, TX 75071

972.547.5100 Main

972.547.5161 Direct



From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Tuesday, March 26, 2024 7:19 AM
To: Jay Reim <jreim@co.collin.tx.us>
Subject: Re: Complaint against Andrea Bouressa

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Attached is the Application to Confirm the Award. The "Award" attached to the Application must be included in the reporter's record for August 1, 2022. Failure to properly introduce the Award is fatal. The judge knows this and that is why she falsified the Findings of Fact to say that she hearing evidence to support the judgment. But the reporter's record is the official record and there was no evidence presented. Her cover up is worse than the crime. I asked her on September 1, 2022, by a filed a Motion for New Trial to give her an opportunity to correct the record. On October 31, 2022, there was a hearing on the Motion for New Trial and she denied a new trial where there was an opportunity to correct her past conduct. There is a reporter's record for the October 31, 2022 hearing.

The paper trail is the reporter's record of all hearings as well as the clerk's record of all documents filed in the case.

Sincerely,

Douglas T. Floyd
Attorney at Law
6521Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

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EXHIBIT 17

DOUGLAS T. FLOYD

3336 Therondunn Dr.
Plano, Texas 75023

Direct 214-704-7081

e-mail: lawyerfloyd@aol.com

May 16, 2024

via: dfharrison@co.collin.tx.us
Deborah Harrison
Collin County Criminal District Attorney
2100 Bloomdale Rd Suite 100
McKinney, TX 75071

Re: Open Records Request

Dear Ms. Harrison:

On March 7, 2024, I filed criminal complaint against Judge Andrea Bouressa with Matthew Polk, Investigator, Criminal Investigations Division, Collin County Sheriff's Office. The complaint was subsequently assigned to Sgt. Jay Reim. On March 26, 2024, Sgt. Reim send me an email stating that the Collin County District Attorney had declined the case.

I received an email from Derrick W. Jackson, Public Information Officer that I should send my request to you. Accordingly, I am requesting a copy of the file, including all communications between the Sheriff's department and the office of the Collin County Criminal District Attorney regarding the matter.

Sincerely,

Douglas T. Floyd
Douglas T. Floyd

EXHIBIT 18

RE: Open Records Request

From: Debbie F. Harrison (dfharrison@co.collin.tx.us)

To: lawyerfloyd@aol.com

Date: Wednesday, May 29, 2024 at 11:17 AM CDT

Douglas Floyd,

I have received your Public Information Act request. You have asked for a copy of the file including all communications between the Sheriff's Department and the Collin County District Attorney's regarding a criminal complaint that you filed with the Sheriff's Office. The attached criminal complaint is all that was provided to our office by the Sheriff's Office and there are no other records involving this complaint in the file or any records of correspondence.

Sincerely,

Deborah F. Harrison
Assistant District Attorney
Civil Division Chief
Collin County District Attorney's Office
dfharrison@co.collin.tx.us
972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 16, 2024 11:58 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Open Records Request

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Dear Ms. Harrison,

Attached is an Open Records Request that I was told you were responsible for responding to?

Sincerely,

Douglas T. Floyd
Attorney at Law

6521Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com



Criminal Complaint.pdf

1MB

EXHIBIT 19

Re: Open Records Request

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: dfharrison@co.collin.tx.us

Bcc: [REDACTED]

Date: Thursday, May 30, 2024 at 05:26 AM CDT

Dear Ms. Harrison,

I assume from your response that there is no record at the DA's office as to any review or report responding to the complaint? Is there anyway to tell if the complaint was even reviewed by a named individual in the DA's office?

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com

On Wednesday, May 29, 2024 at 11:17:14 AM CDT, Debbie F. Harrison <dfharrison@co.collin.tx.us> wrote:

Douglas Floyd,

I have received your Public Information Act request. You have asked for a copy of the file including all communications between the Sheriff's Department and the Collin County District Attorney's regarding a criminal complaint that you filed with the Sheriff's Office. The attached criminal complaint is all that was provided to our office by the Sheriff's Office and there are no other records involving this complaint in the file or any records of correspondence.

Sincerely,

Deborah F. Harrison
Assistant District Attorney
Civil Division Chief
Collin County District Attorney's Office
dfharrison@co.collin.tx.us
972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 16, 2024 11:58 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Open Records Request

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Dear Ms. Harrison,

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Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

EXHIBIT 20

RE: Open Records Request

From: Debbie F. Harrison (dfharrison@co.collin.tx.us)

To: lawyerfloyd@aol.com

Date: Thursday, May 30, 2024 at 01:58 PM CDT

That is correct, the only record the DA's office has related to this complaint is the complaint itself.

Deborah F. Harrison
Assistant District Attorney
Civil Division Chief
Collin County District Attorney's Office
dfharrison@co.collin.tx.us
972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 30, 2024 5:26 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Re: Open Records Request

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Dear Ms. Harrison,

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Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

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Sincerely,

Deborah F. Harrison

Assistant District Attorney

Civil Division Chief

Collin County District Attorney's Office

dfharrison@co.collin.tx.us

972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 16, 2024 11:58 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Open Records Request

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Dear Ms. Harrison,

Attached is an Open Records Request that I was told you were responsible for responding to?

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

EXHIBIT 21

Re: Open Records Request

From: Douglas T. Floyd (lawyerfloyd@aol.com)

To: dfharrison@co.collin.tx.us

Date: Thursday, May 30, 2024 at 04:28 PM CDT

Not to belabor the point, but the Sheriff's office said they met with someone in the DA's office about the complaint and that the DA declined to pursue the complaint. Are you saying there is no record of a meeting between anyone in the DA's office and the Sheriff's office about the complaint?

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024
214-704-7081
lawyerfloyd@aol.com

On Thursday, May 30, 2024 at 01:58:16 PM CDT, Debbie F. Harrison <dfharrison@co.collin.tx.us> wrote:

That is correct, the only record the DA's office has related to this complaint is the complaint itself.

Deborah F. Harrison
Assistant District Attorney
Civil Division Chief
Collin County District Attorney's Office
dfharrison@co.collin.tx.us
972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 30, 2024 5:26 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Re: Open Records Request

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Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

On Wednesday, May 29, 2024 at 11:17:14 AM CDT, Debbie F. Harrison <dfharrison@co.collin.tx.us> wrote:

Douglas Floyd,

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Sincerely,

Deborah F. Harrison
Assistant District Attorney
Civil Division Chief
Collin County District Attorney's Office
dfharrison@co.collin.tx.us

972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 16, 2024 11:58 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Open Records Request

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Dear Ms. Harrison,

Attached is an Open Records Request that I was told you were responsible for responding to?

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

EXHIBIT 22

RE: Open Records Request

From: Debbie F. Harrison (dfharrison@co.collin.tx.us)

To: lawyerfloyd@aol.com

Date: Monday, June 3, 2024 at 10:50 AM CDT

That is correct, the only record the DA's office has related to this complaint is the complaint itself.

Deborah F. Harrison
Assistant District Attorney
Civil Division Chief
Collin County District Attorney's Office
dfharrison@co.collin.tx.us
972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 30, 2024 4:28 PM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Re: Open Records Request

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Not to belabor the point, but the Sheriff's office said they met with someone in the DA's office about the complaint and that the DA declined to pursue the complaint. Are you saying there is no record of a meeting between anyone in the DA's office and the Sheriff's office about the complaint?

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

On Thursday, May 30, 2024 at 01:58:16 PM CDT, Debbie F. Harrison <dfharrison@co.collin.tx.us> wrote:

That is correct, the only record the DA's office has related to this complaint is the complaint itself.

Deborah F. Harrison

Assistant District Attorney

Civil Division Chief

Collin County District Attorney's Office

dfharrison@co.collin.tx.us

972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 30, 2024 5:26 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Re: Open Records Request

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Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

On Wednesday, May 29, 2024 at 11:17:14 AM CDT, Debbie F. Harrison <dfharrison@co.collin.tx.us> wrote:

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Sincerely,

Deborah F. Harrison

Assistant District Attorney

Civil Division Chief

Collin County District Attorney's Office

dfharrison@co.collin.tx.us

972-548-4326

From: Douglas T. Floyd <lawyerfloyd@aol.com>
Sent: Thursday, May 16, 2024 11:58 AM
To: Debbie F. Harrison <dfharrison@co.collin.tx.us>
Subject: Open Records Request

***** **WARNING:** External Email. Do not click links or open attachments that are unsafe. *****

Dear Ms. Harrison,

Attached is an Open Records Request that I was told you were responsible for responding to?

Sincerely,

Douglas T. Floyd
Attorney at Law
6521 Preston Rd., Suite 100
Plano, Texas 75024

214-704-7081

lawyerfloyd@aol.com

EXHIBIT 23

[Records Center] Public Records Request :: P003111-051724

From: Collin County Sheriff's Office (collincountytx@govqa.us)

To: lawyerfloyd@aol.com

Date: Tuesday, July 16, 2024 at 10:44 PM CDT

--- Please respond above this line ---



RE: Public Information Act Request of May 17, 2024, Reference # P003111-051724

Dear DOUGLAS FLOYD,

The Collin County Sheriff's Office has received your public information request dated 5/17/2024 for the following:

On March 7, 2024, I filed criminal complaint against Judge Andrea Bouressa. I am requesting all records and correspondence regarding the matter in the possession of the sheriff's department. I am not asking for any records or correspondence I provided.

****Please find for your review the Texas Attorney General Opinion OR2024-023391 issued July 8, 2024 regarding the above-referenced Public Information Act request.**

In accordance with the findings and directives of the Attorney General's Office, the Collin County Sheriff's Office will be withholding the requested records except for the "basic information" contained in the Sheriff's Office MEDIA REPORT No. 24046809, a copy of which has been released for your review.**

Thank you for your patience in awaiting this information. If you have any questions or concerns, please respond to this email.

Sincerely,

Collin County Sheriff's Office
Records and Warrants
4300 Community Ave.
McKinney, TX 75071
972.547.5100 Main

To monitor the progress or update this request please log into the [Public Records Center](#)

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